

## UNITED STATES DISTRICT COURT

## FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

14 THIS DOCUMENT RELATES TO:  
15 ALL ACTIONS

16 MDL No. 3047

17 Case Nos.: 4:22-md-03047-YGR-PHK

18 **JOINT MOTION FOR REDACTION  
19 OF TRANSCRIPT OF NOVEMBER 21,  
20 2024 DISCOVERY MANAGEMENT  
21 CONFERENCE**

22 Judge: Hon. Yvonne Gonzalez Rogers  
23 Magistrate Judge: Hon. Peter H. Kang

24 Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective  
25 Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting  
26 Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively,  
27 "YouTube") and Plaintiffs (collectively, the "Parties") submit this Joint Motion for Redaction of  
Transcript of November 21, 2024 Discovery Management Conference.

28 At this time, Plaintiffs do not oppose the sealing request and reserve all rights to  
challenge designations and sealing in the future. Accordingly, the Parties stipulate to the  
following chart. The Parties will lodge with the court reporter a redacted copy of the transcript  
reflecting the requested redactions once available.

1 **I. UNDISPUTED REQUESTS TO REDACT TRANSCRIPT**

Description	Requested Action	Basis for Sealing	Whether Previously Sealed
Transcript of November 21, 2024 Discovery Management Conference	Redact references to material redacted in Joint Letter Brief, Dkt. No. 1305	Good cause exists to seal sensitive and confidential information about YouTube's internal crisis management strategies. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Dkt No. 1334-1, Declaration of Christopher Chiou ("Chiou Decl.") at 2.	YouTube requested to seal the same information in Dkt No. 1334. That request is pending.

14 **IT IS SO STIPULATED AND AGREED.**

15 Respectfully submitted,

16 DATED: November 25, 2024

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18 Professional Corporation

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## **ATTESTATION**

2 I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the  
3 concurrence to the filing of this document has been obtained from each signatory hereto.

5 | Dated: November 25, 2024

By: /s/ Christopher Chiou  
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